

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HECTOR MORALES and ISABEL ORTIZ,

Plaintiff,

26(F) DISCOVERY PLAN

07 Civ. 7511 (WHP)(RLE)

-against-

THE CITY OF NEW YORK, DETECTIVE JEFFREY
CARROLL, SHIELD # 006136, and UNIDENTIFIED
NEW YORK CITY POLICE OFFICERS, EMPLOYEES
AND AGENTS, individually and in their official capacities
as detectives and/or officers of the New York City Police
Department,

Defendants.
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WHEREAS, the parties have conferred pursuant to the Court's Order dated
October 5, 2007.

NOW, therefore, the parties respectfully submit the following Rule 26(f)
discovery plan:

(1) what changes should be made in the timing, form or requirement for disclosure
under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were
made or will be made:

- None; plaintiffs and defendants will exchange Fed. R. Civ. P. 26(a)(1)
disclosures by December 20, 2007.

(2) the subjects on which discovery may be needed, when discovery should be
completed, and whether discovery should be conducted in phases or be limited to or
focused upon particular issues:

- Plaintiffs intend to conduct discovery on the following issues:
 1. The factual allegations and claims alleged in the complaint.
 2. The underlying warrant and basis therefor.

3. Plaintiffs reserve the right to conduct discovery on other topics if necessary pursuant to discovery.

- Defendants intend to conduct discovery on the following issues:

1. The factual allegations and claims alleged in the complaint.
2. Plaintiffs' purported damages.
3. Defendants reserve the right to conduct discovery on other topics as necessitated in the course of discovery.

- The parties agree that discovery will consist of document discovery and deposition discovery.
- The parties propose that all discovery will be completed by April 15, 2008.
- At this time, the parties do not propose to conduct discovery in phases or to limit or focus discovery.
- At this time, the parties do not anticipate expert testimony, but both parties reserve their right to do so if necessary.

(3) what changes should be made in the limitations on discovery imposed under these rules or the local rule, and what other limitations should be imposed:

- None at this time.

(4) any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) and (c):

- None at this time.

Dated: New York, New York
November 22, 2007

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SO ORDERED:

HONORABLE WILLIAM H. PAULEY III
UNITED STATES DISTRICT JUDGE